

## **REMARKS/ARGUMENTS**

Amendments are made to the Specification to clarify the Specification. As a result, no new matter is added by any of the amendments to the Specification.

Claims 1-6, 8-14, 16-21, and 23-25 are pending in the present application. Claims 1, 2, 4, 5, 9-13, 16, 17, 19, 20, 24, and 25 are amended. Support for the amendments to the claims may at least be found in the Specification on page 11, lines 20-24, page 14, lines 16-22, page 15, lines 18-26, page 16, lines 5-11 and 26-29, page 17, lines 15-16, page 19, lines 25-27, and page 20, lines 3-10 and in Figure 1, element 108, Figure 2, elements 206, 212, 216, 226, and 228, Figure 6, elements 600-620, and Figure 7, element 708. As a result, no new matter is added by any of the amendments to the claims. Reconsideration of the claims is respectfully requested.

In this Amendment, Applicants amended claims 1, 2, 4, 5, 9-13, 16, 17, 19, 20, 24, and 25 in this application. Applicants are not conceding in this application that the subject matter encompassed by the earlier presented claims is not patentable over the art cited by the Examiner. The present claim amendments in this Amendment are solely to facilitate expeditious prosecution of this application. Applicants respectfully reserve the right to pursue these claims and additional claims in one or more continuations and/or divisional applications.

### **I. Telephonic Interview with Examiner Pillai on March 12, 2009**

Applicants thank Examiner Namitha Pillai for the courtesy extended to Applicants' representative during the March 12, 2009 telephonic interview. During the teleconference, the Examiner and Applicants' representative discussed proposed amendments to independent claims 9, 17, and 24 to overcome rejections under § 101. The Examiner appeared to indicate that the amendments to the Specification and the amendments to independent claims 9 and 17 contained in this Response to Office Action would overcome the § 101 rejections.

In addition, the Examiner and Applicants' representative discussed proposed amendments to the independent claims to further distinguish the present invention from the cited prior art. The Examiner appeared to indicate that the amendments to the independent claims contained in this Response to Office Action would overcome the cited prior art.

Therefore, it is Applicants' representative's understanding that barring additional materially relevant prior art being found in an updated search, the present claims are now in condition for allowance.

## **II. 35 U.S.C. § 101, Claims 9-14, 16-21, and 23**

The Examiner rejects claims 9-14, 16-21, and 23 under 35 U.S.C. § 101 as being directed towards non-statutory subject matter. This rejection is respectfully traversed.

In rejecting the claims the Examiner states, "The claims recite an apparatus but do not disclose physical hardware devices that are included in this apparatus." Office Action dated December 22, 2008, pages 2-3, item 3. In response, independent claims 9 and 17 are amended to recite physical hardware, such as a processor and a storage device, in the apparatus. As a result, independent claims 9 and 17 recite statutory subject matter. Claims 10-14, 16, 18-21, and 23 are dependent claims depending on independent claims 9 and 17, respectively. Consequently, claims 10-14, 16, 18-21, and 23 also recite statutory subject matter, at least by virtue of their dependence on independent claims 9 and 17.

Therefore, the rejection of claim 9-14, 16-21, and 23 under 35 U.S.C. § 101 has been overcome.

## **III. 35 U.S.C. § 101, Claim 24**

The Examiner rejects claim 24 under 35 U.S.C. § 101 as being directed towards non-statutory subject matter. This rejection is respectfully traversed.

In rejecting the claim the Examiner states, "The claim recites a computer readable medium which as described in the specification includes transmission type media...." Office Action dated December 22, 2008, page 3, item 4. In response, the Specification is amended as shown in the Amendments to the Specification Section above in accordance with the Examiner's recommendation during the March 12, 2009 interview. As a result, the computer readable media now does not include transmission type media. Consequently, independent claim 24 recites statutory subject matter.

Therefore, the rejection of claim 24 under 35 U.S.C. § 101 has been overcome.

**IV. 35 U.S.C. § 102, Anticipation, Claims 1, 6, 9, 14, 17, 21, 24, and 25**

The Examiner rejects claims 1, 6, 9, 14, 17, 21, 24, and 25 under 35 U.S.C. § 102(a) as allegedly being anticipated by *HTML 4.01 Specification* ("HTML"). This rejection is respectfully traversed.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). In this case, each and every feature of the presently claimed invention is not identically shown in the cited reference as arranged in the claims.

As amended, claim 1 recites "receiving...user-defined preferences for identifying series links within a page via a preference customization window that includes different fields for customizing key words and interface options associated with the series links, wherein priority values are assigned to the different fields in the preference customization window to resolve discovery of a plurality of different series links within the page, and wherein the user-defined preferences are stored on a storage device...." HTML makes no reference to the above-recited features. Because HTML does not teach or suggest receiving user-defined preferences for identifying series links within a page, HTML cannot teach or suggest "...identifying...a series link in the current page using the user-defined preferences..." as further recited in amended claim 1.

As a result, HTML does not identically teach each and every element recited in amended claim 1 of the present invention. Amended independent claim 1 is representative of amended independent claims 9, 17, 24, and 25 with regard to similarly recited subject matter. Accordingly, the rejection of independent claims 1, 9, 17, 24, and 25 as being anticipated by HTML has been overcome.

In view of the arguments above, amended independent claims 1, 9, 17, 24, and 25 are in condition for allowance. Claims 6, 14, and 21 are dependent claims depending on

independent claims 1, 9, and 17, respectively. Consequently, claims 6, 14, and 21 also are allowable, at least by virtue of their dependence on allowable claims.

Therefore, the rejection of claims 1, 6, 9, 14, 17, 21, 24, and 25 under 35 U.S.C. §102(a) has been overcome.

**V. 35 U.S.C. § 103, Obviousness Claims 2, 3, 10, 11, and 18**

The Examiner rejects claims 2, 3, 10, 11, and 18 under 35 U.S.C. § 103(a) as allegedly being unpatentable over HTML and *Bae et al.*, U.S. Patent No. 6,226,645 (“Bae”). This rejection is respectfully traversed.

The Examiner bears the burden of establishing a *prima facie* case of obviousness based on the prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). For an invention to be *prima facie* obvious, the prior art must teach or suggest all claim limitations. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974). In this case, the Examiner has not met this burden because all of the recited features of the claims are not found in the cited prior art references as believed by the Examiner. Therefore, the combination of HTML and Bae does not teach or suggest the presently claimed invention recited in the claims.

As shown in Section IV above, HTML does not teach or suggest all claim limitations as recited in amended independent claims 1, 9, and 17 of the present invention. These recited claim limitations not taught or suggested by the HTML reference in Section IV above, also are not taught or suggested by the Bae reference nor does the Examiner cite to any section of the Bae reference that allegedly does so. The Examiner only relies on the Bae reference as disclosing “...searching at least one link in the document for a keyword...” and “...that the step of searching at least one link comprises searching at least one of link text, graphic filename, alt text, and uniform resource locator...” with regard to the limitations recited in claims 2, 3, 10, 11, and 18. Office Action dated December 22, 2008, pages 10-12. Therefore, the Bae reference fails to cure the deficiencies of the HTML reference.

As a result, the combination of HTML and Bae does not teach or suggest all limitations recited in amended independent claims 1, 9, and 17. Accordingly, the Examiner has not established a *prima facie* case of obviousness based on the prior art. Thus, amended independent claims 1, 9, and 17 are in condition for allowance. Claims 2, 3, 10, 11, and 18

are dependent claims depending on independent claims 1, 9, and 17, respectively. Consequently, claims 2, 3, 10, 11, and 18 also are allowable, at least by virtue of their dependence on allowable claims.

Therefore, the rejection of claims 2, 3, 10, 11 and 18 under 35 U.S.C. § 103(a) has been overcome.

## **VI. 35 U.S.C. § 103, Obviousness, Claims 4, 12, and 19**

The Examiner rejects claims 4, 12, and 19 under 35 U.S.C. § 103(a) as allegedly being unpatentable over HTML and *Jang et al.*, U.S. Patent Application Publication No. 2002/0091754 (“Jang”). This rejection is respectfully traversed.

As shown in Section IV above, HTML does not teach or suggest all claim limitations as recited in amended independent claims 1, 9, and 17 of the present invention. These recited claim limitations not taught or suggested by the HTML reference in Section IV above, also are not taught or suggested by the Jang reference nor does the Examiner cite to any section of the Jang reference that allegedly does so. The Examiner only relies on the Jang reference as disclosing “..searching a uniform resource locator of at least one link for an ascending or descending number with respect to the uniform resource locator of the document...” with regard to the limitations recited in claims 4, 12, and 19. Office Action dated December 22, 2008, pages 12-14. Therefore, the Jang reference fails to cure the deficiencies of the HTML reference.

As a result, the combination of HTML and Jang does not teach or suggest all limitations recited in amended independent claims 1, 9, and 17. Accordingly, the Examiner has not established a *prima facie* case of obviousness based on the prior art. Thus, amended independent claims 1, 9, and 17 are in condition for allowance. Claims 4, 12, and 19 are dependent claims depending on independent claims 1, 9, and 17, respectively. Consequently, claims 4, 12, and 19 also are allowable, at least by virtue of their dependence on allowable claims. Furthermore, these dependent claims also contain additional features not taught by HTML and Jang.

For example, amended dependent claim 4 of the present invention, which is representative of amended dependent claims 12 and 19 with regard to similarly recited subject matter, recites “searching...a uniform resource locator of the series link associated with the

current page for an ascending number corresponding to a next contiguous page or a descending number corresponding to a previous contiguous page within the series of pages in the document.” Applicants agree with the Examiner that “...HTML does not disclose the step of identifying a series link comprises searching a uniform resource locator of at least one link for an ascending or descending number with respect to the uniform resource locator of the document.” Office Action dated December 22, 2008, page 12. Therefore, HTML does not teach or suggest the above-recited limitations in amended dependent claims 4, 12, and 19.

The Examiner cites Jang, page 1, paragraph [0014] as teaching the above-recited limitation. Office Action dated December 22, 2008, page 12. This Examiner-cited section of Jang teaches “...converting a numerical combination made of at least one number into an Internet site URL....” Jang, page 1, paragraph [0014]. Jang teaches that the numerical combination is a telephone number and that the numbers constituting the telephone number are converted into corresponding characters according to a mapping table. Jang, page 2, paragraph [0031]. For example, “...the telephone number of ‘019-2189-1400’ is converted into the wireless Internet site URL of ‘www.abjcbjbjess.net’....” Jang, page 2, paragraph [0032]. “The converted URL is matched with the telephone...and stored in a database....” Jang, page 2, paragraph [0033]. After the telephone number is received from a user terminal, the database is searched to find the site URL that corresponds to the received telephone number. Jang, page 3, paragraph [0039]. In other words, Jang teaches creating a new URL using a mapping table to convert a telephone number into corresponding characters and then using the telephone number, which is later received from a user terminal, to search the database for the associated URL. Jang does not teach or suggest that the URL is searched for ascending or descending numbers corresponding to pages in a document. In contrast, amended claim 4 recites “searching...a uniform resource locator of the series link associated with the current page for an ascending number corresponding to a next contiguous page or a descending number corresponding to a previous contiguous page within the series of pages in the document.” Thus, Jang does not teach or suggest this limitation recited in amended dependent claims 4, 12, and 19 either.

Therefore, the rejection of claims 4, 12, and 19 under 35 U.S.C. § 103(a) has been overcome.

## **VII. 35 U.S.C. § 103, Obviousness, Claims 5, 13, and 20**

The Examiner rejects claims 5, 13, and 20 under 35 U.S.C. § 103(a) as allegedly being unpatentable over HTML and *Shuster*, U.S. Patent Application Publication No. 2008/0282329 (“Shuster”). This rejection is respectfully traversed.

As shown in Section IV above, HTML does not teach or suggest all claim limitations as recited in amended independent claims 1, 9, and 17 of the present invention. These recited claim limitations not taught or suggested by the HTML reference in Section IV above, also are not taught or suggested by the Shuster reference nor does the Examiner cite to any section of the Shuster reference that allegedly does so. The Examiner only relies on the Shuster reference as disclosing “...searching a uniform resource locator of at least one link for an alphabetic sequence with respect to the uniform resource locator of the document...” with regard to the limitations recited in claims 5, 13, and 20. Office Action dated December 22, 2008, pages 14-16. Therefore, the Shuster reference fails to cure the deficiencies of the HTML reference.

As a result, the combination of HTML and Shuster does not teach or suggest all limitations recited in amended independent claims 1, 9, and 17. Accordingly, the Examiner has not established a *prima facie* case of obviousness based on the prior art. Thus, amended independent claims 1, 9, and 17 are in condition for allowance. Claims 5, 13, and 20 are dependent claims depending on independent claims 1, 9, and 17, respectively. Consequently, claims 5, 13, and 20 also are allowable, at least by virtue of their dependence on allowable claims.

Therefore, the rejection of claims 5, 13, and 20 under 35 U.S.C. § 103(a) has been overcome.

## **VIII. 35 U.S.C. § 103, Obviousness, Claims 8, 16, and 23**

The Examiner rejects claims 8, 16, and 23 under 35 U.S.C. § 103(a) as allegedly being unpatentable over HTML and *Philyaw et al.*, U.S. Patent No. 6,701,354 (“Philyaw”). This rejection is respectfully traversed.

As shown in Section IV above, HTML does not teach or suggest all claim limitations as recited in amended independent claims 1, 9, and 17 of the present invention. These recited claim limitations not taught or suggested by the HTML reference in Section IV above, also

are not taught or suggested by the Philyaw reference nor does the Examiner cite to any section of the Philyaw reference that allegedly does so. The Examiner only relies on the Philyaw reference as disclosing "...a mouse pointer and automatically placing the mouse pointer over the series link without intervention from a user..." with regard to the limitations recited in claims 8, 16, and 23. Office Action dated December 22, 2008, pages 16-18. Therefore, the Philyaw reference fails to cure the deficiencies of the HTML reference.

As a result, the combination of HTML and Philyaw does not teach or suggest all limitations recited in amended independent claims 1, 9, and 17. Accordingly, the Examiner has not established a *prima facie* case of obviousness based on the prior art. Thus, amended independent claims 1, 9, and 17 are in condition for allowance. Claims 8, 16, and 23 are dependent claims depending on independent claims 1, 9, and 17, respectively. Consequently, claims 8, 16, and 23 also are allowable, at least by virtue of their dependence on allowable claims.

Therefore, the rejection of claims 8, 16, and 23 under 35 U.S.C. § 103(a) has been overcome.

## **IX. Conclusion**

It is respectfully urged that the subject application is patentable over the cited prior art references and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: March 16, 2009

Respectfully submitted,

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